

CARLSMITH BALL LLP

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Attorneys for Defendant
Guihua Luo King

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GUIHUA LUO KING,

Defendant.

CRIMINAL CASE NO. 08-00019-001

DECLARATION OF JOHN D. OSBORN
IN SUPPORT OF MOTION TO
SHORTEN TIME

I, John D. Osborn, declare:

1. I am a partner with Carlsmith Ball, attorneys for Guihua Luo King with regard to the above captioned matter. I am competent to testify to the matters set forth herein and make this Declaration based on my own personal knowledge and belief.
2. Order Setting Trial Date dated June 20, 2008 ordered that pretrial motions shall be filed no later than Monday, July 7, 2008.
3. Movant has yet to receive any discovery from the United States of America in order to properly determine whether any pretrial motions should be filed by July 7, 2008, including raising any mandatory affirmative defenses and/or suppressing certain evidence obtained in violations of Movant's constitutional rights.

1 4. Without said discovery, Movant will be unduly prejudiced due to her inability to
2 adequately defend herself and establish of all available defenses and objections to evidence
3 unknown to her.

4 5. Pursuant to Criminal Local Rule 12.1, Court upon motion and for good cause shown may
5 extend the time for filing motions.

6 7. Counsel for Movant has caused to be delivered to the United States of America a copy of
7 the Motion to Extend the Time for Filing Motions and a copy of the Motion to Shorten Time.


8 8. The United States of America does not object to Movant's Motion to Extend the Time for
9 Filing Motions until July 21, 2008.

10 9. For the above reasons, counsel for Movant requests that the time for hearing on the
11 Motion to Extend the Time for Filing Motions until July 21, 2008 be shortened as fits the Court's
12 calendar.

13 I declare under penalty of perjury that the foregoing is true and correct to the best of my
14 knowledge and that this Declaration is executed on July 1, 2008 at Saipan, Commonwealth of the
15 Northern Mariana Islands.

16 CARLSMITH BALL LLP

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18 DATED: Saipan, MP, July __/__, 2008.

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20 JOHN D. OSBORN
21 Attorneys for Defendant
22 GUIHUA LUO KING
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